



State of Rhode Island
Division of Public
Utilities & Carriers

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February 28, 2019

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

Re: Docket No. 4857

Dear Ms. Massaro,

I am writing in response to e-mail correspondence dated February 26, 2019, that the parties in this matter have received, as well as the accompanying revised procedural schedule. The Commission issued the revised schedule after the Division of Public Utilities and Carriers ("Division") submitted correspondence seeking an extension of time for responding to data requests that the Commission had propounded to the Division.

In its schedule, among other things, the Commission requested the Division to provide responses to data requests by March 4, 2019 "for the previously proposed capital efficiency mechanism." Due to the necessity of allocating resources to respond to the requests relative to the revised mechanism by March 15, 2019, as well as the short time remaining until March 4, 2019, the data responses which the Division will endeavor to provide regarding the previously proposed mechanism may be relatively brief. Nonetheless, the Division will endeavor to meet the March 4th date.

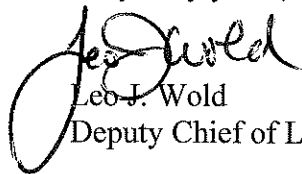
In its February 26, 2019 e-mail, the Commission also requested that the Division file "pre-filed testimony" regarding the revised mechanism and include responses to the questions and answers "as part of its pre-filed testimony in support of the mechanism" by March 15, 2019. The Division anticipates filing responses to the Commission's data requests regarding the revised mechanism (along with a revised mechanism) on March 15, 2019. The Commission, however, had not required the filing of direct testimony in the original

procedural schedule. The preparation and submission of such testimony, thus, was not anticipated. Further, the revised mechanism is not (and most likely will not be) in final form until shortly before it is filed on March 15, 2019. Submission of direct testimony regarding the revised mechanism by March 15, 2019, therefore, is neither possible nor practicable. Nonetheless, the Division will make every effort to prepare and submit direct testimony as soon as possible after March 15, 2019. At this time, the Division believes that it will be able to file direct testimony regarding the revised mechanism by April 1, 2019. Since data responses regarding the revised mechanism will have been submitted on March 15, 2019, the Division does not plan to include the responses in the testimony.

One final observation regarding the revised procedural schedule. While the Commission has requested the Division to file direct testimony by a particular date, the schedule does not provide a date for the filing of rebuttal testimony. If the National Grid does not agree with the revised mechanism then it would possess, at a minimum, well over a month and half to submit rebuttal testimony—a time-period that is unwarranted and potentially prejudicial to the Division.

If the Commission and/or the Company believes that the dates set forth in this correspondence require modification, the Division would be happy to discuss any of their concerns at a mutually convenient time.

Very truly yours,



Leo J. Wold

Deputy Chief of Legal Services, DPUC

cc: Service List